

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL 2804

CASE NO.: 1:17-md-02804

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This document relates to:

Sarasota County Public Hospital District d/b/a  
Sarasota Memorial Health Care System v.  
Purdue Pharma L.P., et. al.

JUDGE DAN AARON POLSTER

Case No. 8:18-cv-02236-JSM-TGW  
1:18-op-46136-DAP

**SHORT FORM FOR  
SUPPLEMENTING FIRST  
AMENDED COMPLAINT AND  
AMENDING DEFENDANTS**

Plaintiff, Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System (“the District”), submits this supplemental pleading incorporating as if fully set forth herein its own prior pleadings and the common factual allegations identified and the RICO causes of action included in the Corrected Second Amended Complaint and Jury Demand in the case of *The County of Summit, Ohio, et al., v. Purdue Pharma L.P., et al.*, Case No. 1:18-op-45090 (“*Summit County Pleadings*”), *In Re National Prescription Opiate Litigation*, in the United States District Court for the Northern District of Ohio, Dkt #513, 514<sup>1</sup>), and as may be amended in the future, and any additional claims asserted herein. Plaintiff also hereby amends its complaint to alter the defendants against which claims are asserted as identified below. To the extent defendants were previously sued in the District’s existing First Amended Complaint and they are no

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<sup>1</sup> Dkt #513 is the redacted Summit Second Amended Complaint and Dkt #514 is the unredacted Summit Corrected Second Amended Complaint filed under seal in Case No. 1:17-md-02804-DAP. The redacted Summit Corrected Second Amended Complaint is also filed in its individual docket, Case No. 1:18-op-45090-DAP, Dkt#24. United States District Court for Northern District of Ohio, Dkt #1466 is Summit Third Amended Complaint.

longer identified as defendants herein, they have been dismissed without prejudice except as limited by CMO-1, Section 6(e). Dkt. #232.

### **INCORPORATION BY REFERENCE OF EXISTING COMPLAINT**

1. The District's existing First Amended Complaint (No. 1:18-op-46136-DAP, Dkt. #20) is expressly incorporated by reference to this Short Form as if fully set forth herein.

### **PARTIES – DEFENDANTS**

2. Having reviewed the relevant ARCOS data,<sup>2</sup> the District asserts claims against the following Defendants:

Purdue Pharma L.P.<sup>3</sup>, Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Endo International PLC, Endo Pharmaceuticals, Inc., Janssen Pharmaceuticals, Inc., Insys Therapeutics, Inc.<sup>4</sup>, Mallinckrodt LLC<sup>5</sup>, Mallinckrodt Brand Pharmaceuticals, Inc., Mallinckrodt Enterprises, LLC, Mallinckrodt Enterprises Holdings, Inc., AmerisourceBergen Corporation, Cardinal Health, Inc., McKesson Corporation, Johnson & Johnson, Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., AmerisourceBergen Drug Corporation, Allergan PLC f/k/a Actavis PLC, Watson Laboratories, Inc., Actavis Laboratories FL, Inc. f/k/a Watson Laboratories, Inc.-Florida, Anda Inc., CVS Health Corporation, Walgreens Boots Alliance, Inc. a/k/a Walgreen Co. and Walmart Inc. f/k/a Wal-Mart Stores, Inc.

**I, Morgan R. Bentley, Counsel for Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System, certify that in identifying all Defendants, I have followed the procedure approved by the Court and reviewed the ARCOS data that I understand to be relevant to Sarasota County Public Hospital District d/b/a Sarasota**

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<sup>2</sup> Pursuant to the Court's November 8, 2018, Order Regarding Plaintiff's Motion for Modification of CMO-1 (Dkt. 1106), the ARCOS data provided to Plaintiff reflects: "the names of all labelers (as identified by NDC code) who manufactured and/or labeled more than five percent (5%) of the market share of opioids distributed in the relevant county or county-equivalent in at least three of the nine years available in the ARCOS data" and "the name of each distributor who distributed more than five percent (5%) of the market share of opioids distributed in the relevant county or county-equivalent in at least three of the nine years available in the ARCOS data."

<sup>3</sup> Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company (collectively, "Purdue") are named herein only for the purposes of preserving Plaintiff's prepetition rights against Purdue and not for purposes of asserting any new claim or advancing any existing claims against Purdue.

<sup>4</sup> Insys Therapeutic, Inc. ("Insys") is named herein only for the purpose of preserving Plaintiff's prepetition rights against Insys and not for the purposes of asserting any new claim or advancing any existing claim against Insys.

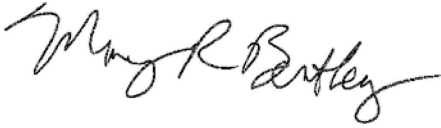
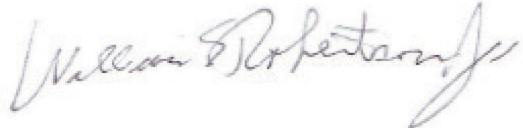
<sup>5</sup> Mallinckrodt LLC, Mallinckrodt Brand Pharmaceuticals, Inc., Mallinckrodt Enterprises, LLC, and Mallinckrodt Enterprises Holdings, Inc. ("Mallinckrodt") are named herein only for the purpose of preserving Plaintiff's prepetition rights against Mallinckrodt and not for the purposes of asserting any new claim or advancing any existing claim against Mallinckrodt.

**Memorial Health Care System.**

**I further certify that, except as set forth below, each of the Defendants newly added herein appears in the ARCOS data I reviewed.**

**I understand that for each newly added Defendant not appearing in the ARCOS data I must set forth below factual allegations sufficient to state a claim against any such newly named Defendant that does not appear in the ARCOS data.**

Respectfully submitted June 11, 2021.

<p><b>THE BENTLEY LAW FIRM</b></p>  <hr/> <p><b>MORGAN R. BENTLEY, ESQ.</b> Florida Bar No. 0962287 <a href="mailto:mbentley@thebentleylawfirm.com">mbentley@thebentleylawfirm.com</a> <b>DAVID A. WALLACE, ESQ.</b> Florida Bar No. 0608386 <a href="mailto:dwallace@thebentleylawfirm.com">dwallace@thebentleylawfirm.com</a> 783 South Orange Avenue, Third Floor Sarasota, Florida 34236 Telephone: (941) 556-9030 Facsimile: (941) 312-5316 Secondary Email: <a href="mailto:mdiven@thebentleylawfirm.com">mdiven@thebentleylawfirm.com</a> <i>Attorneys for Plaintiff Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System</i></p>	<p><b>THE ROBERTSON LAW FIRM, P.A.</b></p>  <hr/> <p><b>WILLIAM E. ROBERTSON, JR., ESQ.</b> Florida Bar No. 436607 <a href="mailto:bill@robertsonlaw.com">bill@robertsonlaw.com</a> P.O. Box 49405 Sarasota, Florida 34230-6405 Telephone: (941) 374-9008 Facsimile: (941) 365-5828 <i>Attorney for Plaintiff Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System</i></p>
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**The following newly added Defendants *do* appear in the ARCOS data I reviewed:**

AmerisourceBergen Drug Corporation  
Actavis Laboratories FL, Inc. f/k/a Watson Laboratories, Inc. – Florida  
Watson Laboratories, Inc.  
Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.  
Allergan PLC f/k/a Actavis PLC<sup>6</sup>

<sup>6</sup> The list of Allergan-related entities shall be understood to incorporate all affiliates that owned, manufactured, distributed, monitored, or sold opioid medicines at issue, including: Allergan Finance, LLC; Allergan Sales, LLC; Allergan USA, Inc.; Watson Laboratories, Inc.; Actavis Elizabeth LLC; Actavis Pharma, Inc.; Actavis

Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.  
Anda Inc.  
CVS Health Corporation  
Walgreens Boots Alliance, Inc. a/k/a Walgreen Co.  
Walmart Inc. f/k/a Wal-Mart Stores, Inc.

**The following newly added Defendants *do not appear* in the ARCOS data I reviewed:**

Johnson & Johnson

Factual Allegations Regarding Individual Defendants

2.1 N/A

2.2 N/A

**COMMON FACTUAL ALLEGATIONS**

3. By checking the boxes in this section, Plaintiff hereby incorporates by reference to this document the common factual allegations set forth in the *Summit County* Pleadings as identified in the Court's Order implementing the Short Form procedure. Dkt. # 514, 1282.

☒ Common Factual Allegations (Paragraphs 130 through 670 and 746 through 813)

☒ RICO Marketing Enterprise Common Factual Allegations (Paragraphs 814-848)

☒ RICO Supply Chain Enterprise Common Factual Allegations (Paragraphs 849-877)

4. If additional claims are alleged below that were not pled in the District's existing First Amended Complaint (other than the RICO claims asserted herein), the facts supporting those allegations must be pleaded here. The District asserts the following additional facts to support the claim(s) identified in Paragraph 6 below (below or attached):

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LLC; Actavis Mid Atlantic LLC; Actavis Kadian LLC; Actavis Totowa LLC; Actavis SouthAtlantic LLC; Actavis Laboratories UT, Inc.; Actavis Laboratories FL, Inc.; and Allergan Finance LLC f/k/a Actavis, Inc., f/k/a Watson Pharmaceuticals, Inc.

**No additional claims are alleged.**

**CLAIMS**

5. The following federal **RICO causes of action** asserted in the *Summit County* Pleadings as identified in the Court’s implementing order and any subsequent amendments, Dkt. #514, 1282, are incorporated in this Short Form by reference, in addition to the causes of action already asserted in the District’s existing First Amended Complaint (check all that apply):

☒ First Claim for Relief – Violation of RICO, 18 U.S.C. § 1961 *et seq.* – Opioid Marketing Enterprise (Against Defendants Purdue, Cephalon, Janssen, Endo and Mallinckrodt (the “RICO Marketing Defendants”)) (*Summit County* Pleadings, Paragraphs 878-905)

☒ Second Claim for Relief – Violation of RICO, 18 U.S.C. § 1961 *et seq.* – Opioid Supply Chain Enterprise (Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen (the “RICO Supply Chain Defendants”)) (*Summit County* Pleadings, Paragraphs 906-938)

6. Plaintiff asserts the following **additional claims** as indicated (below or attached):


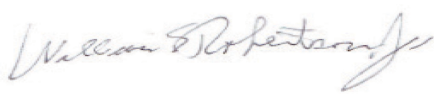
**No additional claims are asserted.**

7. To the extent the District wishes to **dismiss claims** previously asserted in the District’s existing First Amended Complaint, they are identified below and will be dismissed without prejudice.

**The District does not dismiss any claims previously asserted.**

**WHEREFORE**, Plaintiff prays for relief as set forth in the *Summit County* Pleadings in *InRe National Prescription Opiate Litigation* in the United States District Court for the Northern District of Ohio, MDL No. 2804 and in the District’s existing First Amended Complaint as has been amended herein.

Respectfully submitted June 11, 2021.

<b>THE BENTLEY LAW FIRM</b>  <hr/> <b>MORGAN R. BENTLEY, ESQ.</b> Florida Bar No. 0962287 <a href="mailto:mbentley@thebentleylawfirm.com">mbentley@thebentleylawfirm.com</a> <b>DAVID A. WALLACE, ESQ.</b> Florida Bar No. 0608386 <a href="mailto:dwallace@thebentleylawfirm.com">dwallace@thebentleylawfirm.com</a> 783 South Orange Avenue, Third Floor Sarasota, Florida 34236 Telephone: (941) 556-9030 Facsimile: (941) 312-5316 Secondary Email: <a href="mailto:mdiven@thebentleylawfirm.com">mdiven@thebentleylawfirm.com</a> <i>Attorneys for Plaintiff Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System</i>	<b>THE ROBERTSON LAW FIRM, P.A.</b>  <hr/> <b>WILLIAM E. ROBERTSON, JR., ESQ.</b> Florida Bar No. 436607 <a href="mailto:bill@robertsonlaw.com">bill@robertsonlaw.com</a> P.O. Box 49405 Sarasota, Florida 34230-6405 Telephone: (941) 374-9008 Facsimile: (941) 365-5828 <i>Attorney for Plaintiff Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System</i>
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**Attachment A to Short Form for Supplementing Complaint and Amending Defendants and Jury Demand (“Short Form”) (Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System Case No. 1:18-op-4631-DAP)**

Paragraph 2 – The Following Defendants are named in this action:

Purdue Pharma L.P., Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Endo International PLC, Endo Pharmaceuticals, Inc., Janssen Pharmaceuticals, Inc., Insys Therapeutics, Inc., Mallinckrodt LLC, Mallinckrodt Brand Pharmaceuticals, Inc., Mallinckrodt Enterprises, LLC, Mallinckrodt Enterprises Holdings, Inc., AmerisourceBergen Corporation, Cardinal Health, Inc., McKesson Corporation, Johnson & Johnson, Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., AmerisourceBergen Drug Corporation, Allergan PLC f/k/a Actavis PLC, Watson Laboratories, Inc., Actavis Laboratories FL, Inc. f/k/a Watson Laboratories, Inc.-Florida, Anda Inc., CVS Health Corporation, Walgreens Boots Alliance, Inc. a/k/a Walgreen Co. and Walmart Inc. f/k/a Wal-Mart Stores, Inc.

**JURISDICTIONAL ALLEGATIONS**

This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because the District’s claim under the Racketeer Influenced and Corrupt Organizations Act (“RICO”), 18 U.S.C. § 1961 *et seq.* raises a federal question. This Court has supplemental jurisdiction over the District’s state-law claims under 28 U.S.C. § 1367 because those claims are so related to the RICO claim as to form part of the same case or controversy.

This Court also has diversity jurisdiction pursuant to 28 U.S.C. § 1332.

This Court has personal jurisdiction over Defendants pursuant to Fla.Sta.Ann. §48.193 (West) because they transact business in the State of Florida, contract to supply goods and manufactured products in the state of Florida, carry on a continuous and systematic part of their general businesses within Florida, including Sarasota County, have transacted substantial business with Florida and Sarasota County entities and residents, and have caused grave harm to the Sarasota County as a result.

Venue as to each Defendant is proper in this court under 29 U.S.C. § 1391(b)(2) because a substantial part of the events and omissions giving rise to the claim occurred in the United States District Court for the Middle District of Florida. Venue is also proper under 18 U.S.C. § 1965(a) because Defendants reside, are found, have agents, or transact their affairs in the Middle District of Florida, and this case is subject to transfer to *In re National Prescription Opiate Litigation MDL*, 1:17-MD-0284 (N.D. Ohio) (“MDL 2804”), Dkt # 232 (N.D. Ohio), “to eliminate delays associated with transfer to this Court of cases filed in or removed to other federal district courts, any Plaintiff whose case would be subject to transfer to these MDL proceedings may fil its case directly in this District.” *Id.* ¶ 6.a.

### **ALLEGATIONS SPECIFIC TO DEFENDANTS**

#### **APPEARING IN THE ARCOS DATA**

##### **A. Allegations Against Distributor Defendants**

- a. AmerisourceBergen Drug Corporation*
- b. Anda, Inc.*

1. The Distributor Defendants are defined below. At all relevant times, the Distributor Defendants have distributed, supplied, sold, and placed into the stream of commerce the prescription opioids, without fulfilling the fundamental duty of wholesale drug distributors to detect and warn of diversion of dangerous drugs for non-medical purposes. The Distributor Defendants universally failed to comply with federal and/or state law. The Distributor Defendants are engaged in “wholesale distribution,” s defined under state and federal law. The District alleges the unlawful conduct by the Distributor Defendants is a substantial cause for the volume of prescription opioids plaguing communities.

2. AmerisourceBergen Drug Corporation (“AmerisourceBergen”) is a Delaware corporation with its principal place of business in Chesterbrook, Pennsylvania.



AmerisourceBergen through its various DEA registrant subsidiaries and affiliated entities, is a wholesaler of pharmaceutical drugs that distributes opioids throughout the country including Sarasota County, Florida.

3. Anda, Inc. (“Anda”) is a distributor of generic pharmaceuticals. Anda, Inc. is a Florida corporation with its principal place of business in Weston, Florida. Anda through its various DEA registrant subsidiaries and affiliated entities, including but not limited to, Anda Pharmaceuticals, Inc., is the fourth largest distributor of generic pharmaceuticals in the United States. In October 2016, Defendant Teva Ltd. acquired Anda from Allergan plc. (i.e., Defendant Actavis), for \$500 million in cash. At all times relevant to this Complaint, Anda distributed prescription opioids throughout the United States, including Sarasota County, Florida.

**B. Allegations Against National Retail Pharmacy Defendants**

- a. CVS Health Corporation*
- b. Walgreens Boots Alliance, Inc. a/k/a Walgreen Co.*
- c. Walmart Inc. f/k/a Wal-Mart Stores, Inc.*

4. CVS Health Corporation (“CVS”) is a Delaware corporation with its principal place of business in Rhode Island.

5. CVS Pharmacy, Inc. is a Rhode Island corporation with its principal place of business in Rhode Island.

6. CVS Indiana, LLC is an Indiana limited liability company with its principal place of business in Rhode Island.

7. CVS Health, CVS Pharmacy and CVS Indiana are collectively referred to as “CVS”. At all times relevant to this Complaint, CVS distributed prescription opioids throughout Florida including Sarasota County.

8. Walgreens Boots Alliance, Inc. a/k/a Walgreens Co. is an Illinois corporation with

its principal place of business in Deerfield, Illinois. Defendant Walgreen Eastern Co., Inc. is a New York corporation with its principal place of business in Deerfield, Illinois. Defendants Walgreen Co. and Walgreen Eastern Co. are collectively referred to as “Walgreens”. Walgreens is registered to do business in Florida under the name Walgreen Co. Walgreens has a distribution center in Jupiter, Florida, and conducts business as a wholesale distributor. Walgreens was the largest distributor of oxycodone to retail pharmacies in Florida. At all times relevant to this Complaint, Walgreens distributed prescription opioids throughout Florida including Sarasota County.

9. Walmart Inc., f/k/a Wal-Mart Stores, Inc., is a Delaware corporation with its principal place of business in Arkansas.

10. Wal-Mart Stores East, LP is a Delaware limited partnership with its principal place of business in Arkansas.

11. Walmart, Inc. and Wal-Mart Stores East, LP are collectively referred to as “Wal-Mart”. Wal-Mart through its various DEA registrant subsidiaries and affiliated entities, conducts business as a licensed wholesale distributor. At all times relevant to this Complaint, Walmart distributed prescription opioids throughout Florida including Sarasota.

12. Collectively, CVS, Walgreens and Walmart are referred to as “National Retail Pharmacies.”

**ALLEGATIONS SPECIFIC TO DEFENDANTS  
NOT APEARING IN ARCOS DATA**

**C. Allegations Against Marketing Defendants**

*a. Johnson & Johnson.*

13. Johnson & Johnson (“J&J”) is a New Jersey corporation with its principal place of business in New Brunswick, New Jersey. While J&J is not listed in the ARCOS data for Sarasota

County, Florida, several of J&J subsidiaries are listed in the ARCOS Data. The subsidiaries are Ortho-McNeil-Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., Allergan Sales, LLC, Allergan USA, Inc., Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc., Watson Laboratories, Inc., Actavis Pharma, Inc. f/k/a Watson Pharma, Inc. which all appear in the ARCOS Data.

14. J&J controls the sale and development of Janssen Pharmaceuticals' drugs and Janssen's profits inure to J&J's benefit.

15. Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc. is a Pennsylvania corporation with its principal place of business in Titusville, New Jersey, and is a wholly owned subsidiary of J&J. J&J corresponds with FDA regarding Janssen's products.

16. Janssen Pharmaceuticals, Inc. was formerly known as Ortho-McNeil-Janssen Pharmaceuticals, Inc. which was formerly known as Janssen Pharmaceutica, Inc.

17. J&J owns over 10% of Janssen Pharmaceuticals stock. J&J controls the sale and development of Janssen Pharmaceuticals drugs and Janssen Pharmaceuticals profits inure to J&J's benefit.

18. J&J also asserts control over Janssen through its management team. According to Janssen's website, the "leadership team that guides Janssen" contains several J&J executives.<sup>7</sup>

19. J&J, Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc, ("OMP") and Janssen Pharmaceutica, Inc. (collectively, "Janssen") are or have been in the business of manufacturing, selling, promoting, and/or distributing both brand name and generic

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<sup>7</sup> Members of Janssen's "leadership team" include Joaquin Duato, Vice Chairman of the Executive Committee, Johnson & Johnson; Paul Stoffels, M.D. Vice Chairman of the Executive Committee, Chief Scientific Officer, Johnson & Johnson; Jennifer Taubert, Executive Vice President, Worldwide Chairman, Pharmaceuticals, Johnson & Johnson; Robin L. Kumoluyi, Vice President & Chief Quality Officer Pharmaceuticals, Johnson & Johnson; Jeff Steinhorn, Former Chief Information Officer, Pharmaceuticals, Head of Enterprise Functions, Johnson & Johnson Technology; and Scott White, Company Group Chairman, North American Pharmaceuticals Johnson & Johnson. <http://www.janssen.com/about/our-leadership>. (original visit Sept. 18, 2018, last visited May 18, 2021)

opioids throughout Sarasota County, Florida.

20. J&J, Janssen Pharmaceuticals, OMP, and Janssen Pharmaceutica and their DEA registrant subsidiaries and affiliates (collectively, “Janssen”) are or have been engaged in the manufacture, promotion, distribution, and sale of opioids nationally, and in Sarasota County.

21. Allergan plc (“Allergan”) is a public limited company incorporated in Ireland with its principal place of business in Dublin, Ireland, and its administrative headquarters and all executive officers located in Madison, New Jersey. In its Form 10-K filed with the SEC, Allergan stated that it does business in the United States.

22. Allergan Finance, LLC (f/k/a Actavis, Inc., f/k/a Watson Pharmaceuticals, Inc.) is a limited liability company incorporated in Nevada and headquartered in Madison, New Jersey. Allergan Finance, LLC is a wholly-owned subsidiary of Allergan plc.

23. Allergan Sales, LLC is incorporated in Delaware and headquartered in Irvine, California. Allergan Sales, LLC is the wholly-owned subsidiary of Allergan plc.



24. Allergan USA, Inc. is incorporated in Delaware and headquartered in Madison, New Jersey. Allergan USA, Inc. is currently responsible for opioid sales in Florida. Allergan USA, Inc. is a wholly-owned subsidiary of Allergan plc.

25. Actavis Pharma, Inc., f/k/a Watson Pharma, Inc. (“Actavis”) is registered to do business in Florida as a Delaware corporation with its principal place of business in New Jersey. Actavis manufactures or has manufactured generic opioids.

26. The Actavis Group was acquired by Watson Pharmaceuticals, Inc. in October 2012 and the combined company changed its name to Actavis, Inc. October 2012 Actavis, Inc. changed

its name to Actavis plc. In March 2015 Actavis plc acquired Allergan, Inc.

Respectfully Submitted June 11, 2021.

<p><b>THE BENTLEY LAW FIRM</b></p>  <hr/> <p><b>MORGAN R. BENTLEY, ESQ.</b> Florida Bar No. 0962287 <a href="mailto:mbentley@thebentleylawfirm.com">mbentley@thebentleylawfirm.com</a> <b>DAVID A. WALLACE, ESQ.</b> Florida Bar No. 0608386 <a href="mailto:dwallace@thebentleylawfirm.com">dwallace@thebentleylawfirm.com</a> 783 South Orange Avenue, Third Floor Sarasota, Florida 34236 Telephone: (941) 556-9030 Facsimile: (941) 312-5316 Secondary Email: <a href="mailto:mdiven@thebentleylawfirm.com">mdiven@thebentleylawfirm.com</a> <i>Attorneys for Plaintiff Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System</i></p>	<p><b>THE ROBERTSON LAW FIRM, P.A.</b></p>  <hr/> <p><b>WILLIAM E. ROBERTSON, JR., ESQ.</b> Florida Bar No. 436607 <a href="mailto:bill@robertsonlaw.com">bill@robertsonlaw.com</a> P.O. Box 49405 Sarasota, Florida 34230-6405 Telephone: (941) 374-9008 Facsimile: (941) 365-5828 <i>Attorney for Plaintiff Sarasota County Public Hospital District d/b/a Sarasota Memorial Health Care System</i></p>
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